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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER, a Washington nonprofit corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF JUSTICE; and its component, DRUG ENFORCEMENT ADMINISTRATION.

Defendants.

Case No. 2:20-cv-00674-JHC

PARTIES' THIRD STIPULATED MOTION TO EXTEND FILING DEADLINE FOR PLAINTIFF'S MOTION FOR FEES AND COSTS & ORDER

## STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Human Rights Defense Center ("Plaintiff") and Defendants Department of Justice and Drug Enforcement Administration (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file its motion for attorneys' fees and costs. Specifically, the Parties request an additional 30-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	September 23, 2024	October 23, 2024

The parties have finalized a settlement agreement on Plaintiff's fees for this matter, and are currently awaiting payment, which may be impacted by the potential government

PARTIES' THIRD STIPULATED MOTION FOR EXTENSION - 1 & ORDER (No. 2:20-cv-00674-JHC)

- 1			
1	shutdown. Therefore, good cause exists to extend this deadline because the parties have		
2	reached a resolution, which obviates the need for expenditure of further litigant and judici		
3	resources. Good cause also exists because there is no prejudice towards any party.		
4	Accordingly, the Parties respectfully request the Court grant this Motion.		
5	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
6	I certify that this paper contains 163 words, in compliance with Local Civil Rule		
7	7 (e)(1).		
8	DATED this 23rd day of September, 2024.		
9 10	United States Attorney	DAVIS WRIGHT TREMAINE LLP	
11	1 By <u>s/ Kyle Forsyth</u> KYLE FORSYTH, WSBA #34609	By <u>s/ <i>Caesar Kalinowski IV</i></u> Eric M. Stahl, WSBA #27619	
12	United States Attorney's Office	Caesar Kalinowski IV, WSBA #52650 DAVIS WRIGHT TREMAINE LLP	
13 14	Seattle, Washington 98101-1271	920 Fifth Avenue, Suite 3300 Seattle, WA 98104 Tel: 206-622-3150	
15	Fax: 206-553-2422	Fax: 206-757-7700 Email: ericstahl@dwt.com	
16	6 Attorney for Federal Defendants	caesarkalinowski@dwt.com	
17	7	Attorneys for Plaintiff	
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PARTIES' THIRD STIPULATED MOTION FOR EXTENSION - 2 & ORDER (No. 2:20-cv-00674-JHC)

**ORDER** IT IS SO ORDERED. Dated this 23rd day of September, 2024. La A. Chun United States District Judge 

PARTIES' THIRD STIPULATED MOTION FOR EXTENSION - 3 & ORDER